

23 MAR '20 14:24 REC'D USDC-ORP

UNITED STATES DISTRICT COURT

for the
District of Oregon

____ Division

Case No.

3:20-cv-477-HZ
(to be filled in by the Clerk's Office)

Jury Trial: (check one)



Yes



No

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint.
If the names of all the plaintiffs cannot fit in the space above,
please write "see attached" in the space and attach an additional
page with the full list of names.)

-v- STATE OF OREGON

Andrew Erwin, HERSHELL Brown
Washington County District Attorneys
Office

Defendant(s)

(Write the full name of each defendant who is being sued. If the
names of all the defendants cannot fit in the space above, please
write "see attached" in the space and attach an additional page
with the full list of names.)

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

STEVEN WILLIS

Street Address

City and County

PORTLAND, MULTNOMAH

State and Zip Code

OREGON

Telephone Number

971-288-0962

E-mail Address

solamoniid@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

Defendant No. 1

Name
 Job or Title *(if known)*
 Street Address
 City and County
 State and Zip Code
 Telephone Number
 E-mail Address *(if known)*

ANDREW ERWIN
 JUDGE
 145 NE 2nd AVE
 HILLSBORO, WASHINGTON COUNTY
 OREGON, 97124
 503-846-2887

Defendant No. 2

Name
 Job or Title *(if known)*
 Street Address
 City and County
 State and Zip Code
 Telephone Number
 E-mail Address *(if known)*

HERSHELL BROWN
 CRIMINAL DEFENSE ATTORNEY
 9420 N. PORTSMOUTH
 PORTLAND, MULTNOMAH
 OREGON,

Defendant No. 3

Name
 Job or Title *(if known)*
 Street Address
 City and County
 State and Zip Code
 Telephone Number
 E-mail Address *(if known)*

WASHINGTON COUNTY DISTRICT ATTORNEYS
 DISTRICT ATTORNEY OFFICE
 145 NE 2nd AVE
 HILLSBORO, WASHINGTON COUNTY
 OREGON, 97124
 503-846-2887

Defendant No. 4

Name
 Job or Title *(if known)*
 Street Address
 City and County
 State and Zip Code
 Telephone Number
 E-mail Address *(if known)*

STATE OF OREGON

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Fourth, Fifth, Sixth, Fourteenth Amendments

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* _____, is a citizen of the State of *(name)* _____.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated under the laws of the State of *(name)* _____, and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, *(name)* _____, is a citizen of the State of *(name)* _____. Or is a citizen of *(foreign nation)* _____.

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

See Attached pages

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Remedy the injury \$15,000,000

VACATE THE SENTENCE

CLAIM 1.)

At my pretrial Judge Erwin made a note that my Attorney filed a motion of self defense in my case. Judge Erwin denied me a setover to be able to locate and subpoena the only witness I had who could corroborate my version of the events. Judge Erwin also wouldn't allow a recorded jailhouse phone call between me and my witness of her telling me what she told my attorney about what she saw that day. I had only been in custody about 44 days at this time. Judge Erwin allowed the district attorney to introduce drug paraphernalia into my trial as well as let a forensic expert from the Oregon State Police testify to there being no testible narcotics. Count one being PCS was NO-complainted.

After Judge Erwin found me guilty on all charges I tried to whisper something into my attorney's ear and the Judge suddenly got angry and told me he didn't want to sentence me at that moment because he was angry. The following week at sentencing the Judge referred to himself as a bully. The Judge gave me separate probations for each charge he found me guilty of, 4 months credit for time served only on one of the lesser charges. He then told me to expect to be on the in and out program for the next few years.

CLAIM 2.)

On about October, 28, 2019 the district attorney told the Judge that the state could not proceed unless the defendant waived their 60 day fast & speedy due to the fact theres no time on the d.a.s schedule for a trial within the 60 day rule. My attorney told the Judge that I denied to waive. After a short absence from the Judge, and after receiving what appeared to be trial dates from my attorney, the district attorney then told the Judge that they then have dates for trial.

CLAIM 3.)

On about October, 28, 2019 my attorney at the time, after the Judge excused himself for a moment after having just heard that I refused to waive my 60 day fast and speedy, appeared to have provided the district attorney with dates for trial. The Judge came back in and the district attorney gave the Judge dates for trial after moments before saying they didn't have time on their schedule and that they could only proceed if I waived my 60-days.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 3-23-2020

Signature of Plaintiff

Printed Name of Plaintiff


STEVEN DAWAYNE WILLIS

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address